

# EXHIBIT H

**From:** Helen Chaitman  
**Sent:** Sunday, November 19, 2017 6:00 AM  
**To:** Sheehan, David J.; Fein, Amanda E.  
**Subject:** Subpoenas served on traders

Dave: I very much appreciated your statements at our meeting last week that the Trustee is willing to cooperate with me in producing the documents I have requested, *i.e.*, all of the third party trading records received by Madoff from other financial firms and custodial banks, regardless of time period and regardless of whether the trades were deemed "House 5" or House 17" because, as I explained, Madoff operated as one entity and I view the distinction between House 5 and House 17 as artificial. In response to my email about scheduling the next day of Madoff's deposition for early December to accommodate Amanda's pregnancy, you suggested we not rush to continue Madoff's deposition and that we schedule it in early 2018.

I am amenable to that, as we discussed, but I want to confirm that the Trustee had a full opportunity to cross-examine Madoff on all issues on which Madoff has, to date, been questioned. Thus, the Trustee will have no objection to the use of Madoff's deposition testimony if it turns out he is unable to continue his deposition.

As you know, I have subpoenaed a great number of Madoff traders for both documents and depositions. The Trustee reacted to those subpoenas in what I can only describe as hysteria. Judge Bernstein, at the Trustee's request, stayed production of documents in response to those subpoenas and indicated that the depositions, pursuant to those subpoena, will be taken once Madoff's deposition is completed. Since the Trustee is now embarking on extensive review of his records in order to comply with my document demands, I would like us jointly to request from Judge Bernstein that we begin the process of scheduling the traders' depositions and production of documents. I see no reason to delay this process. Please let me know if you will agree to this so that we can make a joint request.

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